



February 22, 2010

Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36  
Annual 64.2009(e) CPNI Certification for 2009  
Norstan Communications, Inc. d/b/a Black Box Network Services  
- Form 499 Filer ID 827433**

Dear Ms. Dortch:

Enclosed for filing is the 2009 CPNI Compliance Certification submitted on behalf of Norstan Communications, Inc. d/b/a Black Box Network Services. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 10-91 issued January 15, 2010.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to Norstan Communications, Inc.  
d/b/a Black Box Network Services

Attachments

cc: Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
J. Cassibo, Black Box  
file: Black Box- CPNI  
tms: FCCx2010-1

**ANNUAL 47 C.F.R § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2009
Date Filed:	February 22, 2010
Name of Company covered by this certification:	Norstan Communications, Inc. d/b/a Black Box Network Services
Form 499 Filer ID:	827433
Name of Signatory:	Michael McAndrew
Title of Signatory:	Vice President, Secretary and Treasurer

I, Michael McAndrew, certify that I am an officer of the company named above, and, acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification, as Attachment A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping and supervisory review) set forth in § 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to an enforcement action.



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Michael McAndrew  
Norstan Communications, Inc.  
d/b/a Black Box Network Services

\_\_\_\_\_  
February 19, 2010  
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A  
Explanation of actions taken against data brokers – not applicable  
Summary of customer complaints – not applicable

**ANNUAL 47 C.F.R § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Attachment A

Statement in Support of Certification for Calendar Year 2009

**Norstan Communications, Inc. d/b/a Black Box Network Services**

The Norstan Communications, Inc. d/b/a Black Box Network Services (hereinafter referred to as the "Company") telecommunications offering is the provision of audio-bridging teleconferencing services throughout the United States.<sup>1</sup> The Company does not actively market its teleconferencing services to end users in any fashion, although the Company's teleconferencing services do have a web presence. The Company has not used or disclosed CPNI for any sales or marketing related purpose or activities and the Company has not permitted any third parties to do so.

The Company does have access to CPNI, including billed call detail. This information resides in the Company's computers, accessible only to employees specified by senior management. The Company does not disclose CPNI via an on-line system. The Company does not have any retail locations and therefore does not disclose CPNI in-store. If it elects to do any of the above, in the future, it will follow all the applicable rules set forth in 47 CFR Subpart U.

The Company services are billed directly by the Company and all customer service inquiries are handled by the Company. Disclosure of call detail information to customers over the telephone is only provided if the caller has the bill and can direct questions to customer service by providing specific call detail about which there are questions and, therefore, falls within the exemption for customer service/billing disputes since the customer would be able to provide all of the call detail information necessary to address the customer issue.

With the exception of such customer service inquiries, the Company does not use CPNI for any purpose for which customer approval is required. Should the Company expand its business in the future to include the provision or marketing of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary: (i) the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed; (ii) the implementation of authentication procedures that do not require the use of readily available biographical or account information; (iii) the notification to customers of account change; (iv) the implementation of a program to inform law enforcement in the event of a breach of customer CPNI; and (v) compliance with all CPNI protection requirements.

Requests for raw call records by law enforcement agencies are only granted if a subpoena is provided.

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<sup>1</sup> In filing this CPNI certification, the Company nonetheless reserves all rights as to whether its audio-bridge teleconferencing services are offered on a common carrier or non-common carrier basis. See *Request for Review by Intercall, Inc. of Decision of Universal Service Administrator*, Order, 23 FCC Rcd 10731, ¶ 17-18 (2008).

**Norstan Communications, Inc. d/b/a Black Box Network Services**

Statement of CPNI Procedures and Compliance - 2009  
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The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

The Company has not taken any actions against data brokers in the last year.

The Company did not receive any customer complaints about the unauthorized release of CPNI in the calendar year 2009.